

Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-29 are pending in the application, with 1, 11, 18, and 24 being the independent claims. Claims 1, 11, 18, and 20-26 are sought to be amended. New claims 27-29 are sought to be added. Support for these changes can be found, *inter alia*, in paragraphs 0072-0077 of the Specification, and FIG. 6 of the Drawings. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 102

In the Office Action, the Examiner rejects claims 1-26 under 35 U.S.C. § 102(b), as allegedly being anticipated by U.S. Patent No. 5,914,724 to Deering *et al.* (herein referred to as “Deering”). (Paper No. 13, page 2). Although Applicants respectfully disagree, Applicants believe the Examiner’s rejections are no longer valid and/or have been rendered moot by the proposed amendments, which includes the addition of new dependent claims 27-29.

Referring to the independent claims (namely, claims 1, 11, 18, and 24), Applicants have amended the claims to emphasize features that are not disclosed in Deering. For example, with respect to the independent claims, Deering does not disclose

a method, system, or computer program product for “validating or optimizing one or more of the functions to produce said combination.”

Accordingly, Applicants respectfully submit that Deering does not disclose Applicants’ claimed invention as recited in independent claims 1, 11, 18, and 24. Dependent claims 2-10, 12-17, 19-23, and 25-29 depend from claims 1, 11, 18, and 24, respectively, and therefore, are patentable over Deering for at least the reasons stated above, in addition to the additional features recited therein. For example, claim 26 further recites “preprocessing data **for said combination** to calculate values used repetitively during said executing step,” which is not taught by Deering. In response to the Examiner’s arguments (Paper No. 13, page 4), it should be noted that “pro-processes triangle and vector data and performs geometry data” may refer to “drawing data,” but **not** to “proprocessing data **for said combination (of functions, each function including microinstructions)**”.

Therefore, Applicants respectfully request reconsideration and withdrawal of the Examiner’s rejection of claims 1-26, and allowance thereof. Additionally, Applicants respectfully request favorable consideration and allowance of new claims 27-29.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for

allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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